DM *Petroleum Operations Company*
Strategic Petroleum Reserve

Malcolm Baldrige National Quality Award
2005 Award Recipient

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Ms. Jeanie Franke
Planning and Analysis Branch
Permits Processing Team (6WQ-NP)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

December 17, 2013
31016-TMW-13-105

Dear Ms. Franke:

Subject: **NPDES APPLICATION No. TX0074012, Bryan Mound SPR Oil Storage Facility**
Reference: **Letter: Franke (EPA) to Westbrook (DM); dated November 22, 2013, same subject.**

DM Petroleum Operations Company (DM), the management and operating contractor for the U.S. Strategic Petroleum Reserve (SPR), has prepared and submits this response to the referenced letter on behalf of the U.S. Department of Energy (owner, operator, and permittee).

The referenced correspondence contains four questions regarding the subject application calling for additional information to be supplied within 30 days. Two of the questions request information pertaining to the water discharges from outfalls authorized in the current permit; the third asks for a water quality parameter not limited in the current permit for a named outfall; and, the fourth question asks for information pertaining to the site and surrounding areas potentially affected by those authorized discharges.

Please accept the enclosed Response Sheet providing detailed information for each question in the same numerical sequence posed by EPA in the reference letter. The response sheet shall restate each question and then follow with a response including a brief statement of the data source used.

If Region VI, U.S. Environmental Protection Agency, should require any further information, please contact Mr. Thomas Westbrook of DM Petroleum Operations Company at (504)734-4142.

In addition, I respectfully request that any correspondence directed to DM Petroleum Operations Company concerning this letter include a courtesy copy directed to the attention of: Mr. W.C. Gibson, Jr., Project Manager, Strategic Petroleum Reserve, U.S. Department of Energy, Project Management Office, 900 Commerce Road East, New Orleans, LA 70123. Thank you.

Sincerely,

James E. Leemann, Ph.D.
Director,
Environmental Department

Enclosures:
As stated

cc: W. Woods, DOE, FE-4441
S. Leingang, DOE, FE-4451 (w/o enclosures)

RESPONSE SHEET
NPDES APPLICATION TX0074012
BRYAN MOUND SPR OIL STORAGE FACILITY

Question 1: Please submit 2 years of flow data from each outfall (maximum and average from each outfall).
Response 1:
Permit TX0074012 authorizes discharges from 6 total outfalls. Three of the outfalls are discharges with flow reporting requirements and three discharges are of stormwater with no permit-stated flow reporting. The outfalls with flow reporting, DMRs are used to provide the response for the full and complete calendar years 2011 and 2012. Outfalls with no flow reporting (stormwater), estimates are made using rainfall data applied to drainage (containment) area. Available sources for the rainfall data used are the Water Flow Schematic for the site using 60inches rainfall/year; NOAA; and EISA Section 438 Guidance.

Outfall 001: Brine to Gulf – MAX is 7.10MGD; AVG is 2.60MGD
Outfall 002: Treated sanitary sewage wastewater – MAX is 0.0062MGD; AVG is 0.0011MGD
Outfall 003: Stormwater, Internal Combined outfall from 20 cavern pads – MAX is 0.089MGD; AVG is 0.128MGD
Outfall 004: Stormwater HPP&TPP curbs – MAX is 0.0079MGD; AVG is 0.0055MGD
Outfall 005: Stormwater Tank Farm – MAX is 0.0047MGD; AVG is 0.0033MGD
Outfall 006: Recirculation Loop RWIS – MAX is 15.2MGD; AVG is 4.65MGD

Question 2: Clarify that there were no discharges from outfall 003, 004, and 005. Permits for Industrial discharges are based on the most recent 2 years of effluent data.
Response 2:
Outfall 003 did discharge during the period of record. Although no flow data reporting is required in the permit TX0074012, DMRs were correctly filed for each monitoring period and for the effluent limitations stated documenting flowing conditions. Estimates of flow were made from rainfall data and provided in Response 1.

Outfall 004 did discharge during the period of record. Although no flow data reporting is required in the permit TX0074012, DMRs were correctly filed for each monitoring period and for the effluent limitations stated documenting flowing conditions. Estimates of flow were made from rainfall data and provided in Response 1.

Outfall 005 did discharge during the period of record. Although no flow data reporting is required in the permit TX0074012, DMRs were correctly filed for each monitoring period and for the effluent limitations stated documenting flowing conditions. Estimates of flow were made from rainfall data and provided in Response 1.

Question 3: Submit data on the minimum and maximum pH for outfall 006.
Response 3:
The discharge of outfall 006 is of non-contact, unaffected, ambient recirculated water at the RWIS. No effluent limitations are imposed and only the reporting of average and maximum flows is required. The range of pH for this response is taken from available online surface water measurements for Texas Water Quality monitoring stations for 2013. Station number 11843 located in tidally influenced segment 1202 of the Brazos River is closest to the SPR intake and 9 measurements made from March to September 2013 were found to be: MIN – 7.0 su; MAX – 8.3 su. These data represent waters flowing past the RWIS from a position upstream of the SPR and below DOW Inc.

Question 4: Verify if there is any historical archeological preservation in the area.
Response 4:
On August 15, 2012, the State Historic Preservation Officer, Texas Historical Commission, responded to an SPRPMO inquiry certifying with a signed seal that "No Historic Properties Affected, Projects May Proceed" for both the Big Hill and Bryan Mound SPR sites.